Site: Rose
ID #: MOD980630629
Break: 10.9
Other: 9-8-88
0780

CLEAN SITES INC

PO BOX 216 / HOLDEN MISSOURI 64040 / 816-732-5529 / 816-732-6357

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SEP 12 1988
CMPL SECTION

September 8, 1988

Steven E. Kinser
U.S.E.P.A. Region VII
726 Minnesota Ave.
Kansas City, KS 66101

SUBJECT: Modification to Work Plan-Soil Removal.

Dear Steve:

In response to your letter of September 2, 1988 we have modified the Soil Removal Work Plan. The modified plan is attached. I believe you will find it addresses all of the points in your letter. If you find it satisfactory we propose expanding Article 3.4.8.3 with the detailed specification attached to this letter.

I hereby request your approval of this addition of this specification to the Work Plan. As you know Rollins has begun the soil excavation already and we anticipate completion by the end of September. Your prompt attention to this matter will be appreciated.

Very truly yours,

Robin J. Robinson
CSI Project Manager
Rose Chemicals Site

RJR/clc

Approved

Steven E. Kinser 9-13-88
Steven E. Kinser U.S.E.P.A.

40030604
SUPERFUND RECORDS

SOIL REMOVAL SPECIFICATION

The following procedure will be followed for the removal and disposal of soil from the Rose Chemicals Site.

I. SOIL TO BE REMOVED

Figure 1 shows the grid locations of the soil removal areas of the Site for the initial cut, which is further described below. These blocks showed PCB contamination levels greater than 10 ppm in the sampling program. In the initial cut, soil shall be removed to a depth of six to eight inches below initial ground surface. Removal to greater depth may be required in some or all of the soil removal areas, as noted under the heading, Second Cut, below. In all soil removal areas a final cut shall be made with hand shovels, as noted under the heading, Final Cut, below.

II. SOIL REMOVAL PROCEDURES

A. GENERAL PRECAUTION

Contractor shall insure that PCB contamination is not spread during the soil removal operation. Such care shall be exercised in decontaminating personnel and equipment between each stage of the removal operation as is necessary to prevent the spread of PCB contamination.

Contractor will also insure that during the excavation contaminated dust is not carried off site either by air, water, or tracking. If required, spraying with a light mist of clean water is the preferred means of dust suppression. After the excavation is completed, the site will be left in such condition that rain water runoff will not unduly erode the site and will normally flow into one of the storm water containment ponds.

B. STAGES OF THE OPERATION

1. Marking of Removal Locations

Contractor shall carefully designate on the ground the areas for removal that are prescribed in this Specification. The segments to be excavated will be staked with metal rods on each cormer with metal identifier tags using the numbering system of the John Mathes report.

2. Initial Cut

The initial soil removal cut shall be made either with a sod cutter or toothless backhoe. Contractor shall work from the perimeter to the inside of each soil removal area. Every attempt shall be made to avoid walking over contaminated soil. Once the initial cut has been made and the soil placed in dump trucks or barrels, the crew shall change or wash gloves and boots. After the initial cut, the area shall be visually inspected to see if discoloration indicates PCB penetration into underlying soil.

3. Second Cut. (In case visible discoloration is present)

Each area of discoloration plus a surrounding area five feet beyond the permeter of the stain in all directions shall be excavated to a depth at least eight inches below the level where discoloration is present.

4. Final Cut

The final cut of one to two inches shall be made using hand shovels. The crew shall again change or wash gloves and boots. The shovels shall be wiped off with Penetone 155 Power Cleaner or equivalent after each layer of soil is removed.

5. Disposal of the Soil

The soil shall be placed in leak-proof dump trucks. Each truckload of excavated soil shall be covered with a Visqueen film and then covered with a tarp in such a manner that no dust can escape during transportation.

The soil shall be hauled to an EPA approved Hazardous Waste Landfill and disposed of properly. All DOT and EPA regulations shall be followed during transportation and disposal.

C. ESTIMATED QUANTITIES OF SOIL TO BE REMOVED

The quantities to be removed can be accurately determined only as the work progresses. Based on the areas shaded in Figure 1, and assuming a 6-inch cut, the quantity is roughly 20,000 cu.ft. or 800 cu.yds. However, quantities could vary between 600 and 1200 cu.yds. Density of the soil is estimated at 90 lb./cu.ft. For payment purposes, the weight of soil removed and disposed shall be established as the difference between the tare and loaded weight of each truckload of soil removed from the Site hereunder.

D. REGULATORY COMPLIANCE

Contractor shall provide a Health and Safety Plan and a Spill Prevention, Control and Countermeasure Plan which will be submitted to U.S. EPA for approval. These plans will include a discussion concerning the means to effectively control dust emissions and erosion during and after excavation.

III. EXCAVATION OF BURIED ITEMS

Several metal items are buried in block Q084 and possibly Q057. These items, which may be drums or parts of drums, are to be included in the excavation of those blocks.

IV. VERIFICATION THAT EXCAVATION HAS BEEN SUCCESSFUL

No soil sampling and analysis will be done as a part of this excavation and removal. However, soil sampling will be done as part of the RI/FS contract which should be in place by October 1, 1988. At that time all the areas where soil has been removed will be sampled to ensure that no contaminated soil remains.

V. POST-EXCAVATION TREATMENT OF AREAS EXCAVATED

Contractor shall feather the edges of each excavated area so that it is not a tripping hazard. He shall also make sure that water will not stand in the holes.

No seeding or sodding will be done until after the RI/FS field work has been completed. At that time seeding or other erosion control measures will be implemented.